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## Federal Defenders OF NEW YORK, INC.

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November 22, 2022

By ECF

Honorable John G. Koeltl United States District Judge Southern District of New York APPLICATION GRANTED SO ORDERED

John G. Koeltl, U.S.D.J.

Re: United States v. Jeremiah Perez, 22 Cr. 458 (JGK)

Dear Judge Koeltl:

I write to respectfully request that the Court modify Jeremiah Perez's bond conditions to permit him to travel to his grandmother's house for Thanksgiving dinner this Thursday from 6:00 to 11:00 p.m. The Government consents to this request. Pretrial Services opposes, informing counsel that "[a]s a matter of general policy not specific to Mr. Perez, Pretrial Services opposes all leave requests for social activities for defendants on home detention."

As background, Mr. Perez is indicted on narcotics offenses and is released on a set of bond conditions including, as relevant, home detention with electronic monitoring. He has been compliant with all bond conditions. Mr. Perez's grandmother lives in Manhattan at an address he will provide to Pretrial Services if his request is granted.

Thank you for your attention to this request.

Respectfully submitted,

/s/ Jonathan Marvinny Jonathan Marvinny Assistant Federal Defender 212.417.8792 jonathan\_marvinny@fd.org

cc: AUSA Sarah Mortazavi Jonathan Lettieri, Pretrial Services